

Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ALEXANDRE PELLETIER, Individually
and On Behalf of All Others Similarly
Situated,

Plaintiff,

No. 2:17-cv-05114-MMB

- v. -

ENDO INTERNATIONAL PLC, RAJIV
KANISHKA LIYANAARCHCHIE DE
SILVA, SUKETU P. UPADHYAY, AND
PAUL V. CAMPANELLI

Defendants.

PLAINTIFFS' FIRST REQUESTS FOR DOCUMENTS

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs (as defined below) hereby request that Defendants Endo, De Silva, Upadhyay, and Campanelli (as defined below) each produce for inspection and copying the documents described herein which are in the possession, custody or control of said Defendants or their officers, directors, employees, counsel, partners, corporate parent, subsidiaries or affiliates or persons acting or purporting to act on their behalf, within 30 days following the parties' Fed. R. Civ. P. 26(f) conference, at the offices of Bleichmar Fonti & Auld LLP, 7 Times Square, 27th Floor, New York, New York, 10036. This Request shall be deemed served as of the parties' Fed. R. Civ. P. 26(f) conference.

DOCUMENT REQUEST NO. 30

All Documents and Communications concerning the Par Acquisition. These Documents and Communications should include, but are not limited to, those concerning:

- a. (i) the price paid by You for Par; (ii) the value of Par and its Generic Drug portfolio; (iii) the subpoena that Par received from the DOJ on or around December 2014 concerning Generic Drug pricing (*see* ¶¶ 47, 182, 250 of the Complaint) and any Government Investigations into Par's Generic Drug pricing; (iv) Endo's potential exposure to liability in connection with Par's Generic Drug pricing; (v) the financing and funding for the Par Acquisition, including, but not limited to, the price of Endo Securities as it related to Your ability to enter into and pay for the transaction; (vi) the pricing of Isosorbide, Cholestyramine, Digoxin, Doxycycline Monohydrate, Methimazole, and any of Par's Generic Drugs; and (vii) Your Due Diligence concerning Par's pricing and sales practices concerning Generic Drugs.
- b. Endo's purchase price accounting for the Par Acquisition. These Documents and Communications should include, but are not limited to, those concerning: (i) determination of any preliminary values, any measurement adjustments, and final values; (ii) the identifiable intangible assets acquired; (iii) the impact of updated cash flow projections on the fair value of the assets; (iv) the updated projections; (v) the additional information obtained subsequent to the closing of the Par Acquisition; (vi) the updated product and market based assumptions; and (vii) all consideration of duplicative products.

DOCUMENT REQUEST NO. 31

All Documents and Communications concerning Endo's results in its Generic Drug segment for the fourth quarter and full year of 2015, as announced in Your Form 10-K filed with the SEC on February 29, 2016. These Documents and Communications shall include, but not be limited to, those concerning: (i) the reasons for and analyses concerning the reported results; (ii) investor and analyst reactions to the announcements; and (iii) the trading prices of Endo Securities as they related to the announcement, and thereafter.

DOCUMENT REQUEST NO. 32

All Documents and Communications concerning Your presentation at the Barclays Global Healthcare Conference on March 17, 2016, including, without limitation: (a) Your announcement concerning "Erosion in Generics Base business continuing in Q1"; (b) Your negative guidance for 2016 revenues; (c) De Silva's announcement: "We do continue to see continued price pressure in Q1, particularly around the Qualitest business. If you look across the portfolio of today's business between Qualitest and Par, we do see a little bit more softness in the Qualitest side of the business than we expected. That being said, from a broader full-year perspective, our plan is well intact."; and (d) De Silva's announcement: "And as we said, we do see a little bit of softness in the call it this generic business but nothing that concerns us more broadly about the area in totality." These Documents and Communications shall include, but not be limited to, those concerning: (i) the reasons for and analyses concerning Your assessments and projections; (ii) investor and analyst

reactions to the announcements; and (iii) the trading prices of Endo Securities as they related to the announcements and thereafter.

DOCUMENT REQUEST NO. 33

All Documents and Communications concerning Endo's results in its Generic Drug segment for the first quarter of 2016 and/or Endo's receipt of the CAG Subpoena, as announced in Your Form 10-Q filed with the SEC on May 6, 2016. These Documents and Communications shall include, but not be limited to, those concerning: (i) the reasons for and analyses concerning the reported results; (ii) investor and analyst reactions to the announcements; and (iii) the trading prices of Endo Securities as they related to the announcements and thereafter.

DOCUMENT REQUEST NO. 34

All Documents and Communications concerning the Bloomberg Article. These Documents and Communication should include, but are not limited to, those concerning: (i) Your reactions to the Bloomberg Article; (ii) the contemporaneous statements by You; (iii) investor and analyst reactions to the Bloomberg Article; and (iv) the trading prices of Endo Securities as they related to the Bloomberg Article.

DOCUMENT REQUEST NO. 35

All Documents and Communications concerning Endo's impairment charges, goodwill impairment assessment, and intangible asset impairment charges in the fourth quarter of 2016 related to its Generic Drug segment, as disclosed in Your Form 8-K filed with the SEC on February 28, 2017. These Documents and Communications shall include, but not be limited to, those concerning: (i) the identifiable intangible assets acquired; (ii) the impact of updated cash flow projections on the fair value of the assets; (iii) the updated projections; (iv) the additional information obtained subsequent to the closing of the Par Acquisition; (v) the updated product and market based assumptions; and (vi) all consideration of duplicative products.

DOCUMENT REQUEST NO. 36

All Documents and Communications concerning Endo's poor results for its Generic Drug segment for the fourth quarter of 2016, as announced in Your Form 8-K filed with the SEC on February 28, 2017. These Documents and Communications should include, but not be limited to, those concerning: (i) the reasons for and analyses concerning the reported results; (ii) Endo's investor call held that same day; (iii) investor and analyst reactions to that announcement; and (iv) the trading prices of Endo Securities as they related to that announcement and thereafter.

DOCUMENT REQUEST NO. 37

All Documents and Communications concerning Endo's reduced guidance for Your Generic Drug segment, as announced in Your Form 8-K filed with the SEC on February 28, 2017. These Documents and Communications should include, but not be limited to, those concerning: (i) the reasons for and analyses concerning the reduced guidance; (ii) Endo's investor call held that same day; (iii) investor and analyst reactions to that announcement; and (iv) the trading prices of Endo Securities as they related to that announcement and thereafter.